

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NESSA RISLEY, JAMES FREELAND, ROBERT
SCOTT, ANNIE VENESKY, ANDREW
CARDIS, and DEAN MEYERS, individually and on
behalf of all others similarly situated

Plaintiffs,

-v-

UNIVERSAL NAVIGATION INC. dba UNISWAP
LABS, UNISWAP FOUNDATION, HAYDEN Z.
ADAMS, PARADIGM OPERATIONS LP, AH
CAPITAL MANAGEMENT, L.L.C. dba
ANDREESSEN HOROWITZ, and UNION SQUARE
VENTURES, LLC,

Defendants.

No. 1:22-cv-2780-KPF

The Honorable Katherine Polk Failla

CLASS ACTION

ORAL ARGUMENT REQUESTED

**DECLARATION OF SUSAN E. ENGEL IN SUPPORT OF THE VC DEFENDANTS’
MOTION TO DISMISS THE FIRST AMENDED CLASS ACTION COMPLAINT**

I, Susan E. Engel, declare as follows:

1. I am a partner with the firm Latham & Watkins LLP, counsel for Defendant AH Capital Management, L.L.C., in this litigation.
2. I am licensed to practice law in the State of New York and have been admitted by this Court. I have personal knowledge of the facts stated in this Declaration and, if called upon, could and would testify competently thereto.
3. I make this declaration in support of the Motion to Dismiss the First Amended Class Action Complaint filed by Paradigm Operations, LP, AH Capital Management, L.L.C., and Union Square Ventures, LLC (collectively, the “VC Defendants”).
4. Attached as Exhibit 6 is a true and correct copy of tweets posted by Hayden Adams to his Twitter account, @haydenzadams, on February 11, 2021, at 8:00 pm EST, which was

downloaded from <https://twitter.com/haydenzadams/status/1360031080867373059?lang=en> on December 16, 2022.

5. Attached as Exhibit 7 is a true and correct copy of a page entitled “Introducing UNI” and dated September 16, 2020, on Uniswap Labs’ website, which was downloaded from <https://uniswap.org/blog/uni> on December 16, 2022.

I declare under penalty of perjury under that the foregoing is true and correct.

Executed on December 21, 2022.



Susan E. Engel